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FINAL
INITIAL STUDY

222 KEARNY STREET
OFFICE BUILDING
SAN FRANCISCO

81.687E

April 1982

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222 Kearny Street office
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222 KEARNY STREET

INITIAL STUDY

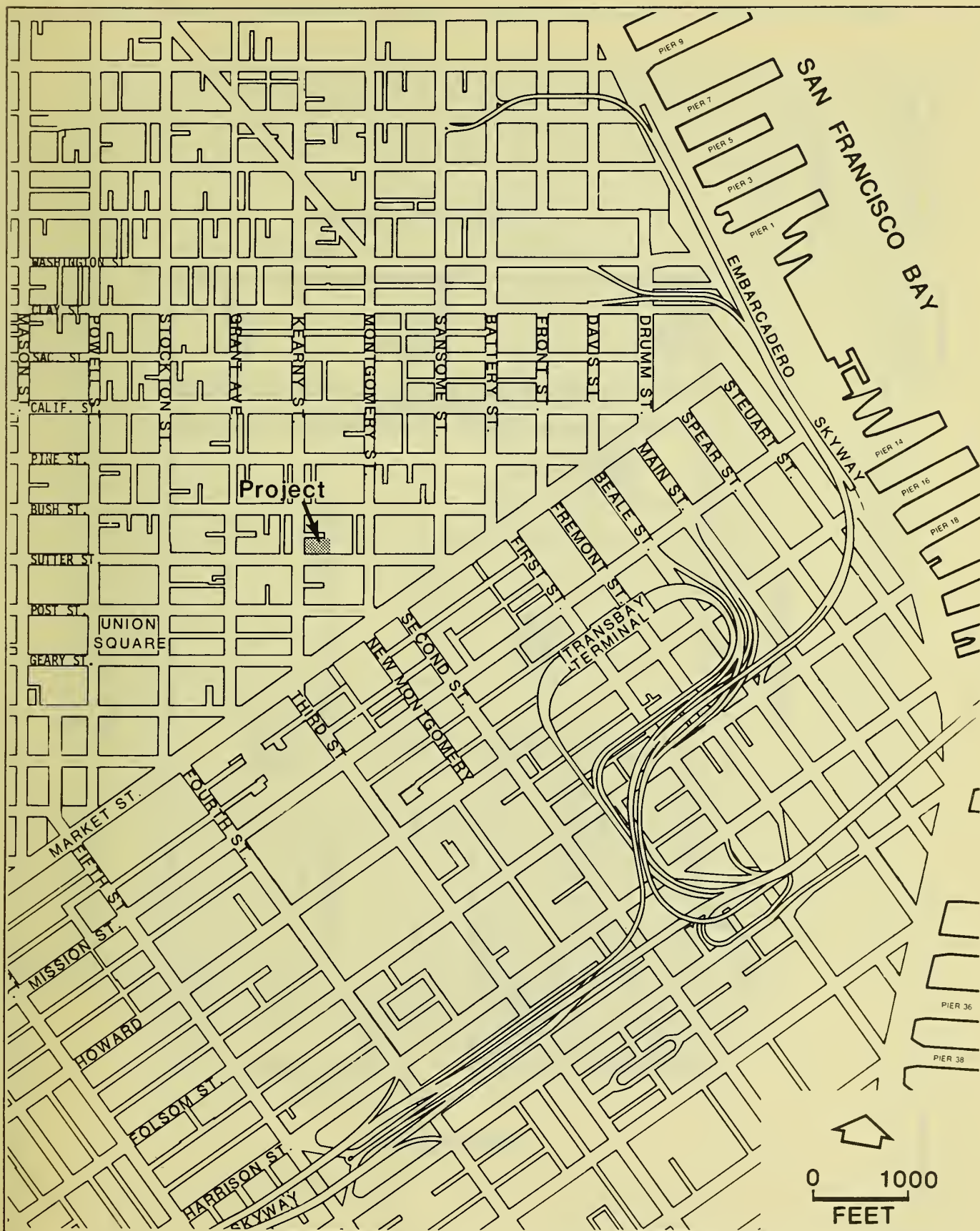
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PROJECT DESCRIPTION

Lincoln Property Company proposes to construct a 19-story office building with street-level retail uses on a 19,955-sq.-ft. site at the northeast corner of the intersection of Sutter and Kearny Sts. on the block bounded by Sutter, Kearny, Bush, and Montgomery Sts. (see Figure 1). The site has frontages of about 170 ft. along Sutter St. and about 120 ft. along Kearny St. The site, Lots 10, 11, and 29 in Assessor's Block 288 (see Figure 2), is in the C-3-0 (Downtown Office) Use District and 500-I Height and Bulk District; permitted floor area ratio (FAR) for the site is 14:1. Lot 10 at 200 Kearny St., and Lot 11 at 220 Kearny St., are occupied by a five-story structure and a four-story structure, respectively. Lot 29, at 154 Sutter St., is occupied by a six-story structure. Buildings at 200 Kearny St. and 154 Sutter St. are included in the list of architecturally and/or historically significant buildings adopted by City Planning Commission Resolution No. 8600.

The project would be a 288-ft.-high, 19-story office building (including one mechanical floor), with total floor area of about 280,000 gross sq.ft. The street level would include 10,000 gross sq.ft. of retail space fronting on Sutter and Kearny Sts. Office space would total 270,000 sq.ft. on 18 levels. One basement level would contain 43 parking spaces. Three off-street loading docks would have access from Hardie Place.

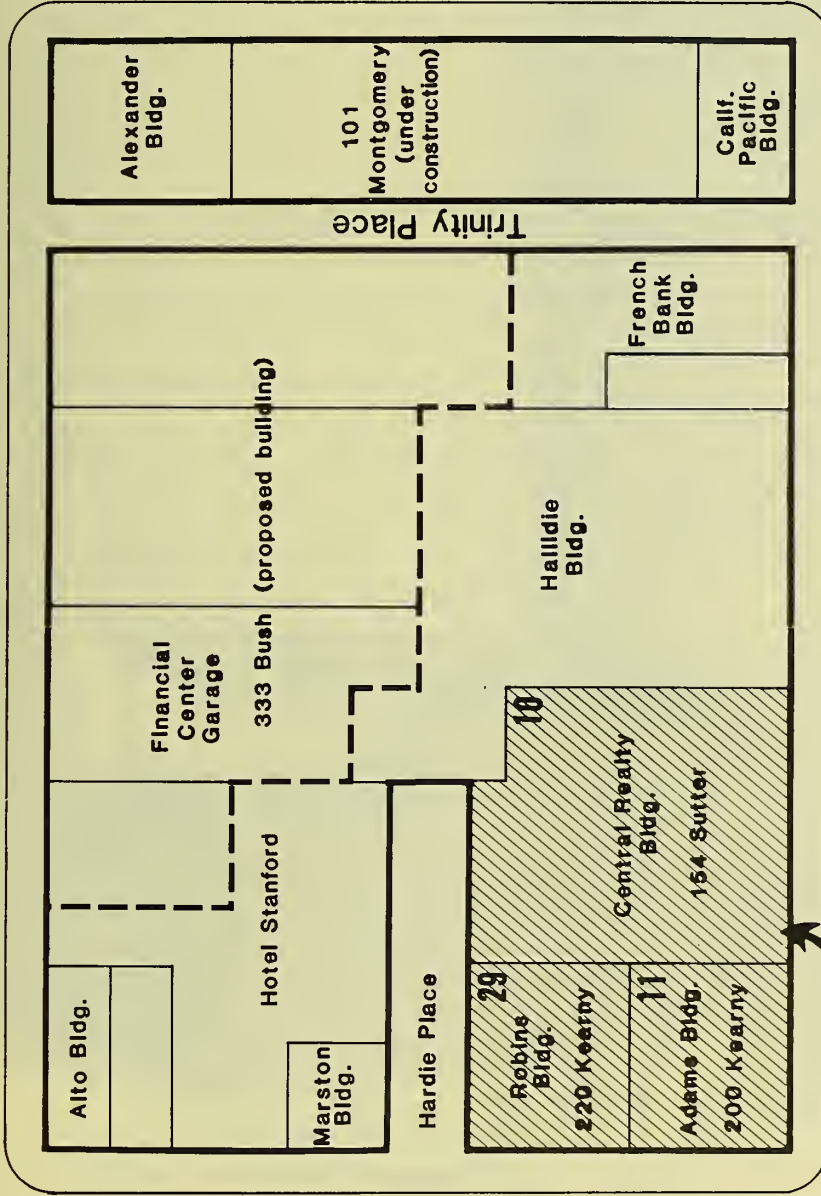
A four-story structure at 220 Kearny St. would be demolished. Exteriors of the five-story 200 Kearny St. building and the six-story 154 Sutter St. building would be restored and preserved, and a new five- to six-story base and interior structures would be constructed and integrated with the restored exteriors. The office tower of the new building would be a 13-story structure (above the base) set back from Sutter St. (see Figure 3).



SOURCE: Environmental Science Associates, Inc.

FIGURE 1: Project Location

Bush Street



Montgomery Street

Kearny Street

Sutter Street

Site

SOURCE: Environmental Science Associates, Inc.

FIGURE 2: Project Block
(Assessor's Block No. 288)



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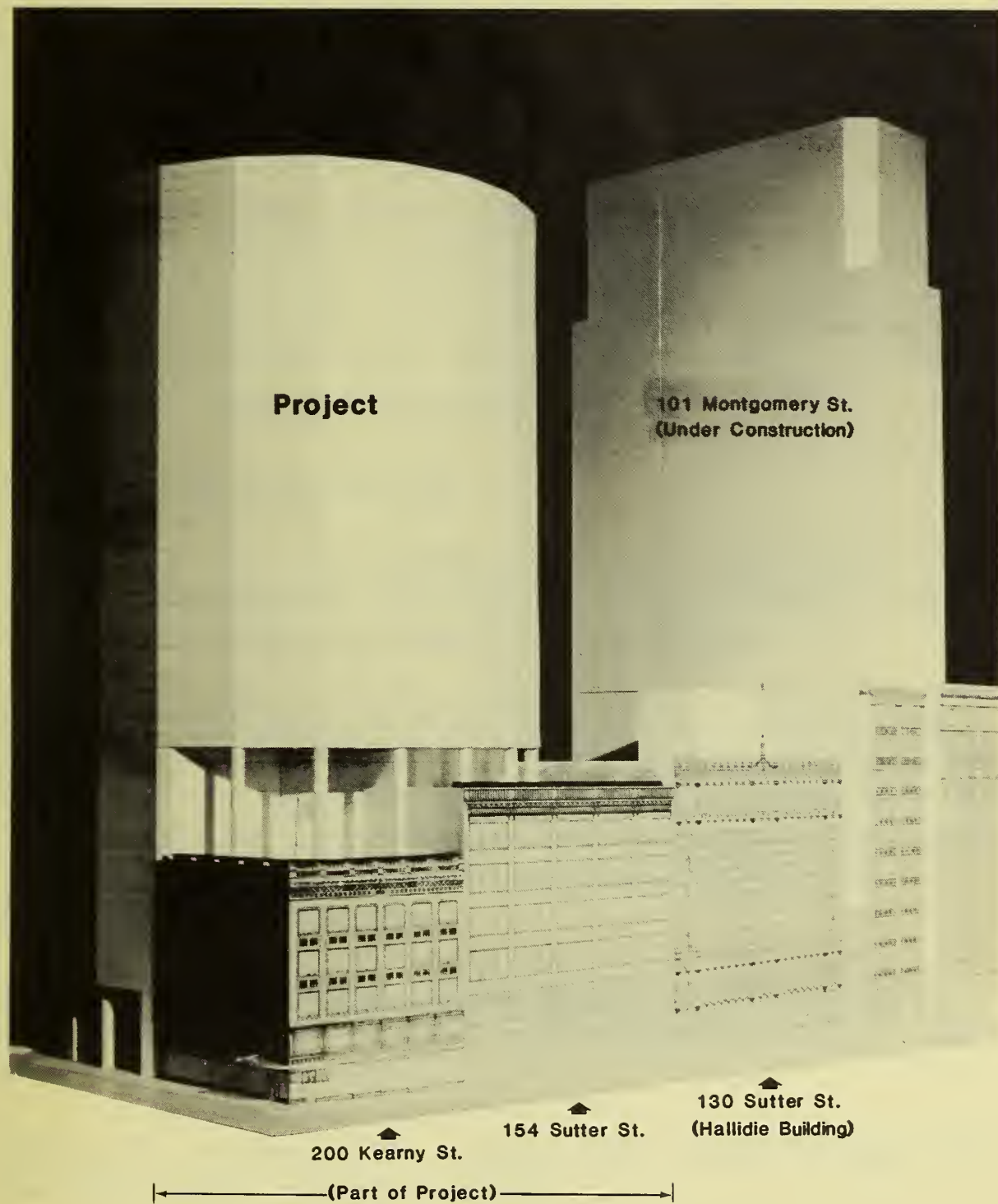


FIGURE 3:
View of Project Model Looking
Northeast from Sutter and
Kearny Streets

SOURCE: Skidmore, Owings and Merrill

SUMMARY OF POTENTIAL ENVIRONMENTAL EFFECTS

EFFECTS FOUND TO BE POTENTIALLY SIGNIFICANT

The 222 Keamy St. project is examined in this Initial Study to identify its potential effects on the environment. Some effects were determined to be potentially significant. Potential impacts which require further analysis in an EIR include transportation including parking, transit and circulation and construction of a long-term parking facility; effects of demolition or partial demolition of three buildings of architectural interest; wind and shadow effects; land use; urban design; cumulative air quality effects; construction noise; energy demand; and housing demand.

EFFECTS FOUND NOT TO BE SIGNIFICANT

Some potential environmental effects would either be insignificant or would be mitigated through measures incorporated into the project design. These require no further environmental analysis. They include:

Noise: After completion, project operation would not perceptibly increase noise levels in the project vicinity. Operational noise would be regulated by, and the project would comply with, the San Francisco Noise Ordinance (Part II, Chapter VII, San Francisco Municipal Code) and the project would include noise insulation measures contained in the Noise Guidelines of the San Francisco Comprehensive Plan.

Public Services and Utilities: Increased demand for public services and utilities attributable to the project would not require additional personnel or equipment.

Biology: The project would have negligible effect on plant or animal life, as the site is totally occupied by structures.

Land (topography, soils, geology)/Water: The project would be supported by deep spread footings; pile driving is not anticipated. Underlying materials would provide adequate foundation support and seismic stability. Existing basements on the site would reduce excavation requirements. No dewatering appears necessary.

Hazards: The site and the project would neither cause nor be affected by hazardous uses or health hazards. Impact on the City's emergency response plan will not be discussed in the EIR because of mitigation measures to be implemented by the project sponsor to insure coordination with the City's emergency planning activities.

Cultural Resources: No significant subsurface resources are expected to be encountered during construction. This topic will not be discussed in the EIR because of mitigation measures to be implemented by the project sponsor to protect any potential resources.

A. GENERAL CONSIDERATIONS

	<u>Yes</u>	<u>Maybe</u>	<u>No</u>	<u>N/A</u>	<u>Disc.</u>
1. Would the project conflict with objectives and policies in the Comprehensive Plan (Master Plan) of the City?	___	<u>X</u>	___	___	<u>X</u>
2. Would the project require a variance, or other special authorization under the City Planning Code?	<u>X</u>	___	___	___	<u>X</u>
3. Would the project require approval of permits from City Departments other than DCP or BBI, or from Regional, State or Federal agencies?	___	___	<u>X</u>	___	___
4. Would the project conflict with adopted environmental plans and goals?	<u>X</u>	___	___	___	<u>X</u>

The project would be consistent with some objectives of the Comprehensive Plan. It would provide office space in the Downtown Office District (C-3-0), which is described in the City Planning Code as "playing a leading national role in finance, corporate headquarters and service industries, and serving as an employment center for the region."

The project would be consistent with Objective 6 of the Commerce and Industry Element of the Comprehensive Plan to "maintain and improve San Francisco's position as a prime location for financial administrative, corporate, and professional activity," and Policy 4 of Objective 6 to "maintain a compact downtown core."

The street level of the project would retain retail uses. This would be consistent with Policy 3 of Objective 7 in the Comprehensive Plan to "design amenities at a pedestrian scale which will enhance the pedestrian environment" and Policy 4 of Objective 6 "to provide adequate amenities for those who live, work and use downtown." However, some retail uses would be displaced by the project and net retail space at the site may be reduced.

The project tower would be set back. This would be responsive to Policies for New Development, Policy 5, of the Urban Design Element of the Comprehensive Plan in attempting to relate "the bulk of buildings to the prevailing scale of development to avoid an overwhelming or dominating appearance in new construction." The project would restore and preserve the exteriors of 200 Kearny St. and 154 Sutter St. This is intended to be consistent with Policies for Conservation, Policy 4, of the Urban Design Element, to "preserve notable landmarks and areas of historical, architectural or aesthetic value . . ."

The project may not be consistent with Objective 1, Policy 4 of the Downtown Transportation Plan which "discourages the addition of new long-term parking spaces in and around downtown." The project basement would provide 43 parking spaces. There is no long-term parking currently provided at the site.

The project would be within two blocks of the Montgomery St. subway station which is served by BART and Muni Metro rail transit lines. The project would be directly accessible by, or close to, bus lines serving San Francisco (Muni), Marin (Golden Gate Transit), the East Bay (AC Transit) and the Peninsula (SamTrans and Muni connections to Southern Pacific rail commuter service), thereby encouraging use of public transit. This would be consistent with Objective 1, Policy 10 of the Downtown Transportation Plan, stating that private automobile traffic "must be reduced" and that "land use development

and transportation services should be coordinated in a manner to maximize efficiency and minimize cost while preserving and strengthening the downtown environment." The off-street loading provided in the project would respond to Objective 11, Policy 4 of the Citywide Parking Plan which encourages off-street loading facilities.

The project would require discretionary review by the City Planning Commission under Resolution No. 8474, which requires review of all projects in the Downtown (C-3 Use Districts) area.

Impacts of the project on architectural resources are discussed on p. 23 in the Cultural Resources section.

B. ENVIRONMENTAL IMPACTS

1. <u>Land Use.</u> Would the proposed project:	<u>Yes</u>	<u>Maybe</u>	<u>No</u>	<u>N/A</u>	<u>Disc.</u>
a. Be different from surrounding land uses?	<u> </u>	<u> X </u>	<u> </u>	<u> </u>	<u> X </u>
b. Disrupt or divide the physical arrangement of an established community?	<u> </u>	<u> X </u>	<u> </u>	<u> </u>	<u> X </u>

The project site is surrounded by office and retail uses. Buildings on the project block generally have office space above street-level retail uses and range from four to ten stories. Exceptions include the six-story Hotel Stanford, immediately north of the site, and the 28-story office building under construction at 101 Montgomery St. A 37-story mixed-use office/housing tower is proposed on the Bush St. frontage of the project block.

The site is at the western edge of the Financial district with highrises generally on the east, north and south, and the downtown retail core adjacent to the site along Kearny St. and spreading generally to the west. The effects of the project regarding land use compatibility require further study in the project EIR.

2. Visual Quality and Urban Design. Would the proposed project:

	<u>Yes</u>	<u>Maybe</u>	<u>No</u>	<u>N/A</u>	<u>Disc.</u>
a. Obstruct or degrade any scenic view or vista open to the public?	---	---	<u>X</u>	---	<u>X</u>
b. Reduce or obstruct views from adjacent or nearby buildings?	<u>X</u>	---	---	---	<u>X</u>
c. Create a negative aesthetic effect?	---	<u>X</u>	---	---	<u>X</u>
d. Generate light or glare affecting other properties?	---	---	<u>X</u>	---	<u>X</u>

The proposed project would not obstruct any major scenic view or vista now available to the public. Views along the Sutter St. and Kearny St. corridors may be changed; views along the Montgomery St. corridor would not be affected. Views across the site from the upper floors of the Hotel Stanford, Sutter Hotel, and Crocker Center (under construction) would be affected. Additional study of the effect of the project on both long- and short-range views will be included in the project EIR.

Existing four- to six-story buildings would be replaced with an 18-story structure. The exterior of the new structure would be intended to be compatible with the adjacent Hallidie Building. (The Hallidie Building is on the City's list of architecturally and/or historically significant buildings and listed on the National Register of Historic Places.) Effects on visual quality and urban design will be discussed in the project EIR.

The project would contain no reflective glass or high-intensity lighting and hence would not impose a reflective or glaring light on other properties. This topic will not be discussed in the EIR.

3. Population/Employment/Housing.
Would the proposed project:

	<u>Yes</u>	<u>Maybe</u>	<u>No</u>	<u>N/A</u>	<u>Disc.</u>
a. Alter the density of the area employment population?	<u>X</u>	---	---	---	<u>X</u>
b. Have a growth-inducing effect?	<u>X</u>	---	---	---	<u>X</u>
c. Require relocation of housing or businesses, with a displacement of people, in order to clear the site?	<u>X</u>	---	---	---	<u>X</u>

	<u>Yes</u>	<u>Maybe</u>	<u>No</u>	<u>N/A</u>	<u>Disc.</u>
d. Create or eliminate jobs during construction, operation or maintenance of the project?	<u>X</u>	<u>---</u>	<u>---</u>	<u>---</u>	<u>X</u>
e. Create an additional demand for housing in San Francisco?	<u>---</u>	<u>X</u>	<u>---</u>	<u>---</u>	<u>X</u>

Approximately 635 people currently work at the project site. About 550 of these people are employed by Dean Witter Reynolds which will move its office to the 101 California St. building scheduled for completion in 1983. Other current occupants include about 50 retail workers; these would be displaced by the project. No housing would be displaced.

Relocation plans for current retail tenants are unknown at this time; they may relocate elsewhere or return to the site after project completion. The project sponsor would offer current tenants the right of "first-refusal" of space in the new building at then applicable rental rates. Tenant displacement effects will be discussed in the project EIR.

The number of workers employed during project construction will also be estimated in the EIR. After project completion, approximately 1,100 people (1070 office employees and 30 retail employees) would work at the site./1/ This would represent a net increase of about 465 persons. If new employment opportunities are located in the project, it may attract new residents to San Francisco or other parts of the Bay Area. Potential housing demand and growth-inducing effects of the project will be discussed in the project EIR.

NOTE - Population/Employment/Housing

/1/ Number of on-site employees estimated at the rates of one employee per 250 sq.ft. of office space, and one employee per 400 sq.ft. of retail space. Source: California Office of Planning and Research, January 1978, Economic Practices Manual, pp. 35-37.

4. Transportation/Circulation.

Would the construction or operation of the project result in:

	<u>Yes</u>	<u>Maybe</u>	<u>No</u>	<u>N/A</u>	<u>Disc.</u>
a. Change in use of existing transportation systems? (transit, roadways, pedestrian ways, etc.)	<u>X</u>	<u>---</u>	<u>---</u>	<u>---</u>	<u>X</u>
b. An increase in traffic which is substantial in relation to existing loads and street capacity?	<u>---</u>	<u>X</u>	<u>---</u>	<u>---</u>	<u>X</u>

	<u>Yes</u>	<u>Maybe</u>	<u>No</u>	<u>N/A</u>	<u>Disc.</u>
c. Effects on existing parking facilities, or demand for new parking?	<u>X</u>	---	---	---	<u>X</u>
d. Alteration to current patterns of circulation or movement of people and/or goods?	<u>X</u>	---	---	---	<u>X</u>
e. Increase in traffic hazards to motor vehicles, bicyclists or pedestrians?	---	<u>X</u>	---	---	<u>X</u>
f. A need for maintenance or improvement or change in configuration of existing public roads or facilities?	---	---	<u>X</u>	---	<u>X</u>
g. Construction of new public roads?	---	---	<u>X</u>	---	---

The project would increase Muni and regional transit patronage and may attract additional automobile trips to the site and the Downtown area. Pedestrian use of sidewalks may increase and access to basement-level parking and truck loading on Hardie Place may result in increased potential for pedestrian and vehicle conflicts. Both project-related and cumulative impacts on transit and traffic will be evaluated in the project EIR.

No existing parking spaces would be eliminated as a result of the project; 43 parking spaces would be provided in the project. Effects of the project and cumulative downtown development on long- and short-term parking require analysis in the project EIR.

5. Noise.

	<u>Yes</u>	<u>Maybe</u>	<u>No</u>	<u>N/A</u>	<u>Disc.</u>
a. Would the proposed project result in generation of noise levels in excess of those currently existing in the area? (During construction)	<u>X</u>	---	---	---	<u>X</u>
b. Would existing noise levels impact the proposed use?	---	---	<u>X</u>	---	<u>X</u>
c. Are Title 25 Noise Insulation Standards applicable?	---	---	<u>X</u>	---	<u>X</u>

Project Construction

Project construction would require approximately 24 months and would involve demolition of some existing buildings, some excavation, and construction of

the project. These activities would temporarily cause noise levels to exceed those existing in the site vicinity. A spread footing foundation would probably be used, and no pile driving is anticipated.

The project contractor would comply with all requirements of the San Francisco Noise Ordinance (Part II, Chapter VII, San Francisco Municipal Code), including limiting noise emissions from powered construction equipment to 30 dBA at a distance of 100 ft. The project contractor would muffle and shield intakes and exhausts, shroud or shield impact tools, and use electric-powered rather than diesel-powered construction equipment, as feasible. Adherence to this limit would ensure that all equipment would cause noise levels at the nearest building to be no greater than present maximum noise levels due to traffic and other mechanical equipment. Impact tools typically do not comply with provisions of Section 2907 of the Noise Ordinance. If it is necessary to use these tools for pile driving, a limitation on the hours of use may be required under the ordinance. Further consideration will be given to this issue in the project EIR, including construction noise effects on workers and residents in the site vicinity.

Trucking of construction material to and from the site would not cause a noticeable increase in average noise levels along haul routes because of existing traffic noise levels of about 75 dBA on the street./1,2/ These noise effects will not be discussed in the EIR.

Project Operation

Noise levels in the vicinity of the project would not increase noticeably due to project operation. Traffic generated by the project during any hour of the day would cause traffic noise levels to increase by less than 1 dBA./1/ Loading dock deliveries and basement parking would generate traffic on nearby streets and on Hardie Place, but increased noise levels would be imperceptible due to existing noise levels on Kearny and Sutter Sts.

Project mechanical equipment noise would be regulated by the San Francisco Noise Ordinance, Section 2909, "Fixed Source Noise Level." In the C-3-0 Use District, the ordinance limits equipment noise levels to 70 dBA between 7 a.m. and 10 p.m. and 60 dBA between the hours of 10 p.m. and 7 a.m. at the receiver's property line. During lulls in traffic, mechanical equipment generating 70 dBA could dominate the site noise environment. As equipment

noise levels would be limited to 60 dBA to meet the nighttime limit, they would not be perceptible within the sound-level context of the project. Discussion of operational noise will not be included in the project EIR.

As is typical of downtown San Francisco, the noise environment of the site is dominated by vehicular traffic noise. The Environmental Protection Element of the San Francisco Comprehensive Plan indicates a day-night average noise level (Ldn) of 75 dBA on Sutter St. in 1974./3/ The Environmental Protection Element contains guidelines for determining the compatibility of various land uses with different noise environments. For office uses, the guidelines recommend no special noise control measures in an exterior noise environment up to an Ldn of 70 dBA. Exterior noise levels at the site are estimated to be 70 to 75 dBA. For these noise levels, the guidelines recommend an analysis of noise reduction requirements and inclusion of noise insulation features in the building design. As this would be done by the project sponsor, no further analysis is needed in the project EIR.

NOTES - Noise

/1/ dBA is the measurement of sound units of decibels (dB). The "A" denotes the A-weighted scale which simulates the response of the human ear to various frequencies of sound.

/2/ Environmental Protection Element, San Francisco Comprehensive Plan, 1974.

/3/ Ldn, the day-night average noise level, is a noise measurement based on human reaction to cumulative noise exposure over a 24-hour period, taking into account the greater annoyance of nighttime noises (noise between 10 p.m. and 7 a.m. is weighted 10 dBA higher than daytime noise).

6. Air Quality/Climate. Would the proposed project result in:

	<u>Yes</u>	<u>Maybe</u>	<u>No</u>	<u>N/A</u>	<u>Disc.</u>
a. Violation of any ambient air quality standard or contribution to an existing air quality violation?	---	<u>X</u>	---	---	<u>X</u>
b. Exposure of sensitive receptors to air pollutants?	---	<u>X</u>	---	---	<u>X</u>
c. Creation of objectionable odors?	---	---	<u>X</u>	---	---
d. Burning of any materials including brush, trees, or construction materials?	---	---	<u>X</u>	---	---
e. Alteration of wind, moisture, or temperature (including sun shading effects), or any change in climate, either locally or regionally?	<u>X</u>	---	---	---	<u>X</u>

Concentrations of air pollutants are monitored by the Bay Area Air Quality Management District (BAAQMD) at 900 23rd St., about two miles south of the site. Prior to 1980, a monitoring station was located at Van Ness Ave. and Ellis St., about 1.2 miles west of the proposed site. Air quality data collected by the BAAQMD at both locations show that San Francisco experiences infrequent excesses of the ambient air quality standards for ozone, carbon monoxide, and total suspended particulate (TSP).

Two types of air quality impacts could be expected from this project: short-term impacts from construction activity, and long-term impacts related to use and operation of the structure. Climatic conditions in downtown San Francisco allow rapid dispersal of air pollutants, so local stationary sources of emissions rarely create a measurable impact at monitoring stations. Rather, their impact is to add to regional accumulations of pollutants. Thus, the project would probably not result in direct violation of any ambient air quality standard, although it would contribute cumulatively to such excesses. The cumulative effects of this and other proposed projects in the project area will be discussed in the project EIR.

Project Construction

Demolition, excavation, and construction activities would affect local air quality for approximately 24 months. Grading and other construction activities would cause a temporary increase in particulate and hydrocarbon emissions. These emissions would be carried by prevailing winds and probably would not cause emissions standards to be violated at the monitoring station. Without mitigation, construction-generated dust might cause excesses of the particulate standard in the immediate project area. Dustfall may occur on surfaces within 200 to 800 ft. of the project site under low winds. Blowing dust may be an annoyance in the vicinity of the site when winds exceed 12 miles per hour. Construction dust is composed primarily of large particles that settle out of the atmosphere rapidly with increasing distance from the source. Thus, it is more of a nuisance than a health hazard, except to sensitive receptors such as pedestrians and any occupants of nearby hotels who may have respiratory ailments.

Diesel-powered construction equipment would emit, in decreasing order by weight, nitrogen oxides, carbon monoxide, sulfur oxides, hydrocarbons, and

particulates. This would increase local concentrations temporarily but would not be expected to increase the frequency of excesses of air quality standards. Pouring asphalt and applying certain architectural coatings would release hydrocarbons./1/ Although ambient concentrations of these pollutants would be increased for the duration of the construction period, no increases in measured concentrations at the 23rd St. monitoring station are expected to occur.

The project sponsor has agreed to the mitigation measures listed on p. 25; therefore, construction air quality impacts will not be discussed in the project EIR.

Project Operation

Project operation and related activities, such as project-generated traffic, would incrementally degrade air quality and impede regional efforts to attain and maintain air quality standards. Combustion of natural gas for space and water heating would generate small amounts of pollutants in the project area. Electrical energy consumption would place an increased demand on local generation plants, possibly resulting in greater emissions from these facilities. Further analysis is necessary to determine the effect of project operation on local concentrations of carbon monoxide, regional emissions of pollutants, and on the frequency of excesses of the standards; this will be discussed in the EIR.

The project may affect wind speed ratios at street level and cast new shadows on surrounding streets and open space. Wind and shadow effects will be addressed in the project EIR.

NOTE - Air Quality/Climate

/1/ Based on U.S. Environmental Protection Agency, Compilation of Pollutant Emission Factors AP-42 p. 11.2.4.1.

7. Utilities and Public Services.

Would the proposed project:

Have an effect upon, or result in a need for new or altered, governmental services in any of the following?

Yes Maybe No N/A Disc.

fire protection	---	---	X	---	X
police protection	---	---	X	---	X
schools	---	---	X	---	X
parks or other recreational facilities	---	---	X	---	X
maintenance of public facilities	---	---	X	---	X
power or natural gas	---	---	X	---	X
communications systems	---	---	X	---	X
water	---	---	X	---	X
sewer/storm water drainage	---	---	X	---	X
solid waste collection and disposal	---	---	X	---	X

Fire protection: The project would increase building area and the number of persons using the site. This would not substantially increase the fire hazard at the site as the project would incorporate extensive fire protection measures to comply with current building and fire code standards. Existing buildings do not meet current code requirements./1/

Fire protection impacts from cumulative downtown development are discussed in San Francisco Federal Savings and Loan Headquarters Draft Environmental Impact Report, EE 80.339, pp. 36 - 38; this document is available at the Office of Environmental Review, 45 Hyde Street, Rm. 319, San Francisco, California. The report concludes that cumulative downtown development would not effect overall fire protection service in San Francisco.

Police protection: The project would increase population and property on the site, thus increasing the potential for crime. The project would not require additional police personnel or equipment./2/ Appropriate security measures (alarms, adequate lighting at entryways, security personnel, closed-circuit camera systems) would reduce the effects of the project on the police department. No further analysis is necessary in the project EIR.

Parks or other recreational facilities: The project would generate a demand for urban recreational facilities, such as plazas and city parks. Union Square is three blocks west of the project site and St. Mary's Square is three blocks north. Crocker Center, under construction at Montgomery and Post Sts., would include a public roof-top plaza.

Power or natural gas: Project implementation would result in an increase in the use of gas and electricity on the site. There would be no supply or capacity problems in supplying these utilities for the project./3/

Communications systems: Pacific Telephone can provide the increased service capacity which would be required for the project./4/

Water: The project would result in a net increase in water use at the site of about 25,000 gallons per day (gpd). Existing mains in Sutter St. have existing capacity and pressure to handle the additional demand./5/

Sewer/storm water drainage: The amount of wastewater generated would be approximately the same as the water used, 25,000 gpd. Sewer mains located in Kearny and Sutter Sts. would be adequate to handle increased sewer flows as well as storm drainage./6/

Solid waste collection and disposal: The project would generate a net increase in solid waste. Collection facilities are adequate to meet the increased demand./7/

Disposal of municipal solid wastes presently occurs at a landfill site in Mountain View. The contract with this facility expires in October 1983. The City is presently negotiating with other landfill sites to accept San Francisco's solid waste on an interim basis until a solid waste program is implemented in late 1986. The solid waste program would consist of intensified recycling, a resource recovery project generating electricity from the burning of solid wastes, and landfill disposal of bypass and residue wastes from the resource recovery process. The project and cumulative development are not expected to present problems in solid waste disposal upon implementation of the solid waste program./8/

All utilities and public services could serve the project with existing capacities and this topic will therefore not be discussed further in the project EIR.

NOTES - Utilities and Public Services

/1/ Joseph A. Sullivan, Chief, Support Services, San Francisco Fire Department, written communication, December 16, 1981.

/2/ Officer Paul Libert, Planning and Research Division, San Francisco Police Department, telephone communication, December 18, 1981.

/3/ Alfred Williams, Industrial Power Engineer, Pacific Gas and Electric Company, telephone communication, December 23, 1981.

/4/ Les Watson, Building Industry Consultant, Pacific Telephone, telephone communication, December 23, 1981.

/5/ J. E. Kenck, Manager, San Francisco Water Department, written communication, January 7, 1981.

/6/ Nathan Lee, Engineering Associate II, San Francisco Cleanwater Program, telephone communication, December 18, 1981.

/7/ Fiore Garbarino, Office Manager, Golden Gate Disposal Company, telephone communication, December 18, 1981.

/8/ David Gavrich, Assistant Manager for Solid Waste Management, Chief Administrative Office, Special Projects, City of San Francisco, telephone conversation, January 6, 1982.

8. Biology.

Yes Maybe No N/A Disc.

a. Would there be a reduction in plant and/or animal habitat or interference with the movement of migratory fish or wildlife species?

___ ___ X ___ ___

b. Would the project affect the existence or habitat of any rare, endangered or unique species located on or near the site?

___ ___ X ___ ___

c. Would the project require removal of mature scenic trees?

___ ___ X ___ ___

The project would not effect plant or animal life or habitat; the site is now totally occupied by structures.

9. Land. (topography, soils, geology) Would the proposed project result in or be subject to:

Yes Maybe No N/A Disc.

a. Potentially hazardous geologic or soils conditions on or immediately adjoining the site? (slides, subsidence, erosion, and liquefaction)

___ ___ X ___ X

b. Grading? (consider height, steepness and visibility of proposed slopes; consider effect of grading on trees and ridge tops)

___ X ___ ___ X

c. Generation of substantial spoils during site preparation, grading, dredging or fill?

___ X ___ ___ X

A preliminary geotechnical evaluation indicates that the site contains sandy fill and dense sand with occasional thin layers of sand and silty clay above bedrock. Bedrock depth is anticipated to be 100 to 130 ft. below street grade and the groundwater level is expected to be below the proposed basement level. The deep footing excavation may encounter some groundwater seepage, but this would be controlled by localized pumping. The dune sands and clay materials would provide excellent building support with a spread footing foundation. No pile-driving is anticipated./1/

Existing basement walls may be used as shoring for the project foundation pit; otherwise, standard shoring systems would be used. Depending on the footing depths of the project, it may be necessary to underpin the foundations of the adjacent Hallidie Building to the east. The exterior wall and column foundations of the Hallidie Building would only require underpinning if the new foundations were to extend several feet below the existing foundations.

Liquefaction and site displacement hazards on the site during a seismic event would be expected to be extremely low.

A more detailed geotechnical analysis would develop criteria for the final project design, including measures to maintain the integrity of the exteriors of 200 Kearny St. and 154 Sutter St. during construction./2/ Adoption of measures in that report and other measures, both agreed to by the project sponsor (see p. 24) would mitigate potential geotechnical hazards of the project, and this topic will not be discussed in the project EIR.

Sutter and Kearny Sts. would be mechanically swept by the demolition and excavation contractors, as required by Code, so that silt would not be washed into the storm drains and dust would be reduced. This would be a provision of excavation and demolition contracts.

NOTES - Land

/1/ Preliminary Geotechnical Evaluation, Sutter/Kearny Building,
Woodward-Clyde Consultants, January 21, 1982.

/2/ Carol Ries, project engineer, Woodward-Clyde Consultants, telephone conversation, April 26, 1982.

10. Water. Would the proposed project result in:

	<u>Yes</u>	<u>Maybe</u>	<u>No</u>	<u>N/A</u>	<u>Disc.</u>
a. Reduction in the quality of surface water?	---	---	<u>X</u>	---	<u>X</u>
b. Change in runoff or alteration to drainage patterns?	---	---	<u>X</u>	---	<u>X</u>
c. Change in water use?	<u>X</u>	---	---	---	<u>X</u>
d. Change in quality of public water supply or in quality or quantity (dewatering) of groundwater?	---	---	<u>X</u>	---	<u>X</u>

As the site is now completely occupied by existing buildings, no change in runoff water quality or drainage patterns is expected after project completion. Water use would increase by approximately 25,000 gpd (see Utilities and Public Services, above). No dewatering appears necessary (see Land, above).

11. Energy/Natural Resources. Would the proposed project result in:

	<u>Yes</u>	<u>Maybe</u>	<u>No</u>	<u>N/A</u>	<u>Disc.</u>
a. Any change in consumption of energy?	<u>X</u>	---	---	---	<u>X</u>
b. Substantial increase in demand on existing energy sources?	---	<u>X</u>	---	---	<u>X</u>
c. An effect on the potential use, extraction, conservation or depletion of a natural resource?	---	<u>X</u>	---	---	<u>X</u>

The building would be constructed to conform with Title 24 of the California Administrative Code, Energy Conservation Standards, and would be designed to minimize energy use. Energy consumption would increase on the site as a result of the increase in total square footage of structure. Electrical and natural gas demand characteristics cannot be identified until more precise building designs are developed. Energy demands and potential conservation measures will be discussed in the project EIR.

Shadows from the structure may result in a reduction in the feasibility of future active solar energy collection installations in some nearby locations off-site; a shadow study will be prepared and discussed in the project EIR. No existing active solar energy collection installations would be affected as none are located in the immediate area north of the site. None are proposed for the project. No other natural energy resources would be directly affected.

12. Hazards. Would the proposed project result in:

	<u>Yes</u>	<u>Maybe</u>	<u>No</u>	<u>N/A</u>	<u>Disc.</u>
a. Increased risk of explosion or release of hazardous substances (e.g., oil, pesticides, chemicals or radiation), in the event of an accident, or cause other dangers to public health and safety?	---	---	<u>X</u>	---	---
b. Creation of or exposure to a potential health hazard?	---	---	<u>X</u>	---	---
c. Possible interference with an emergency response plan or emergency evacuation plan?	---	<u>X</u>	---	---	<u>X</u>

The project would increase the City's daytime population; occupants of the proposed building would contribute to congestion if an emergency evacuation of Downtown were required. The project sponsor has agreed to the measure on p. 27 to mitigate the impact of the project on the City's emergency response plan. This issue will not be discussed in the EIR.

13. Cultural Resources. Would the proposed project:

	<u>Yes</u>	<u>Maybe</u>	<u>No</u>	<u>N/A</u>	<u>Disc.</u>
a. Include or affect a historic site, structure or building?	<u>X</u>	---	---	---	<u>X</u>
b. Include or affect a known archaeological resource or an area of archaeological resource potential?	---	<u>X</u>	---	---	<u>X</u>
c. Cause a physical change affecting unique ethnic or cultural values?	---	---	<u>X</u>	---	<u>X</u>

The three structures on the site are rated in the survey of architecturally significant buildings which was conducted for the Foundation for San Francisco's Architectural Heritage./1/ The buildings at 200 Kearny St. and 154 Sutter St. are also included in the Department of City Planning (DCP) architectural survey and in the list of architecturally and/or historically significant buildings adopted by the City Planning Commission in Resolution No. 8600.

Effects on architectural resources will be discussed in the project EIR.

Archaeological resources may exist on or near the project site. If any artifacts were to be discovered during site excavation, the project sponsor has agreed to measures on p. 25 to determine significance of the artifacts and their possible recovery. Therefore, this topic will not be discussed further in the EIR.

NOTE - Cultural Resources

/1/ Foundation for San Francisco's Architectural Heritage, Splendid Survivors, California Living Books, 1979.

C. MITIGATION MEASURES

	<u>Yes</u>	<u>No</u>	<u>Disc.</u>
Are mitigation measures included in the project?	<u>X</u>	<u> </u>	<u>X</u>
Are other mitigation measures available?	<u>X</u>	<u> </u>	<u> </u>

Mitigation measures proposed as part of the project include the following:

URBAN DESIGN

- The project would be designed to complement the Hallidie Building adjacent to the site on the east. The setback of the tower would be intended to preserve the pedestrian scale of the Sutter St. elevation of the structure.

POPULATION/EMPLOYMENT/HOUSING

- The project sponsor would give current tenants the right-of-first-refusal for leasing space in the project at then-current market rents.

TRANSPORTATION/CIRCULATION

- The project sponsor would encourage transit use through the sale on-site of BART and Muni passes to project occupants, and by encouraging occupant carpool and vanpool systems in cooperation with the non-profit RIDES for Bay Area Commuters organization.
- Secure bicycle parking facilities would be provided, to encourage the use of bicycles by occupants and messengers.
- Two off-street loading docks would be provided, which would reduce on-street commercial deliveries and their associated congestion on Sutter and Kearny Sts., and Hardie Place.
- During the construction period, project truck movement would be limited to the hours between 9 a.m. and 4 p.m., to minimize peak-hour traffic conflicts.

- The project sponsor would contribute to an established Downtown transit assessment district, as appropriate, which would mitigate potential peak-hour transit congestion associated with project development.

AIR QUALITY/CLIMATE

- During excavation, unpaved demolition and construction areas would be wetted to hold down dust. If this were done at least twice a day with complete coverage, particulate emissions (dust) would be reduced by about 50%.
- The general contractor would maintain and operate construction equipment in such a way as to minimize exhaust emissions.
- Should the results of a detailed wind analysis indicate that the project would have substantial wind effects, additional mitigation measures would be considered.

UTILITIES AND PUBLIC SERVICES

- To reduce the demand on police protection services, the project would incorporate internal security measures such as closed circuit television cameras and Life Safety Code measures, including fire alarms, an emergency communication system, an emergency power supply and an on-site emergency water supply. These measures would reduce hazards to building occupants during an earthquake or fire.
- The project would incorporate low-flow faucet and toilet fixtures to reduce water consumption and wastewater.
- The building would be equipped with a trash compactor to reduce the volume of solid waste requiring storage and transport. Separate storage facilities for recyclable waste material would be provided.

LAND (Topography, Soils, Geology)

- A detailed foundation and structural design study would be conducted for the building by a California licensed structural engineer and geotechnical consultant. The project sponsor would follow the recommendations of these studies during the final design and construction of the project.
- The project sponsor would require the project contractor and sub-contractors to obtain a Faithful Performance and Payment Bond, if sufficient financial capability is not evident, and to be responsible for any damage to existing buildings which might result from excavation. This bond would protect the project sponsor and owners of adjacent properties if any damage to these properties were to result from construction activities.
- Excavation pit walls would be shored up and protected from slumping or lateral movement of soils into the pit. Shoring and sheeting with soldier beams could be used for this purpose. The contractor would comply with the Excavation Standards of the California Occupational Safety and Health Agency (Department of Industrial Relations).
- If groundwater seepage from foundation footing excavation requires pumping and disposal, water pumped from the site would be retained in a holding tank to allow suspended particles to settle, if this is found necessary by the Industrial Waste Division of the Department of Public Works, to prevent sediment from entering the storm drain/sewer lines.

ENERGY

- The project would comply with the former Federal Energy Building Temperature Restrictions in the operation of heating, ventilating and air conditioning (HVAC) equipment. The HVAC system would be equipped with an economizer cycle to use outside air for cooling, as feasible.
- Tenant energy consumption would be metered on a floor-by-floor basis.

HAZARDS

- An evacuation and emergency response plan would be developed by project sponsor or building management staff, in consultation with the Mayor's Office of Emergency Services, to insure coordination between the City's emergency planning activities and the project's plan and to provide for building occupants in the event of an emergency. The project's plan would be reviewed by the Office of Emergency Services and implemented by building management before issuance by the Department of Public Works of final building permits.

CULTURAL

- Should evidence of cultural or historic artifacts of significance be found during project excavation, the Environmental Review Officer and the President of the Landmarks Preservation Advisory Board would be notified. The project sponsor would select an archaeologist or other expert to help the Office of Environmental Review determine the significance of the find and whether feasible measures, including appropriate security measures, could be implemented to preserve or recover such artifacts. The Environmental Review Officer would then recommend specific mitigation measures, if necessary, and recommendations would be sent to the State Office of Historic Preservation. Excavation or construction which might damage the discovered cultural resources would be suspended for a maximum of four weeks to permit inspection, recommendation and retrieval, if appropriate.

D. ALTERNATIVES

Yes No Disc.

Were other alternatives considered:

 X -- X

The following alternatives will be addressed in the project EIR:

1. The "no-project" alternative, including development elsewhere.
2. An alternative that would conform to controls proposed in Guiding Downtown Development (San Francisco Department of City Planning, May 1981).
3. An alternative that would demolish all site buildings and develop an office building at an FAR of 14:1.

4. An alternative that would preserve the A-rated 200 Kearny St. and the B-rated 154 Sutter St. buildings in their entirety.

Other alternatives may be identified and discussed in the project EIR.

E. MANDATORY FINDINGS OF SIGNIFICANCE

	<u>Yes</u>	<u>No</u>	<u>Disc.</u>
1. Does the project have the potential to degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal, or eliminate important examples of the major periods of California history or prehistory?	---	<u>X</u>	---
2. Does the project have the potential to achieve short-term, to the disadvantage of long-term, environmental goals?	---	<u>X</u>	---
3. Does the project have possible environmental effects which are individually limited, but cumulatively considerable?	<u>X</u>	---	<u>X</u>
4. Would the project cause substantial adverse effects on human beings, either directly or indirectly?	---	<u>X</u>	---
5. Is there a serious public controversy concerning the possible environmental effect of the project?	---	<u>X</u>	<u>X</u>

The project may contribute to the cumulative effects of downtown development on transportation systems, air quality, energy demand, and housing demand.

There is some possible controversy about proposed treatment of the buildings at 200 Kearny St. and 154 Sutter St., related to issues of architectural interest and the context of the project block face along Sutter St.

REGIONAL AGENCIES

Alameda-Contra Costa County
Transit District
508 - 16th Street
Oakland, California 94612
Attention: Don Larson

Association of Bay Area
Governments
Hotel Claremont
Berkeley, California 94705
Attention: Charles Q. Forrester

Bay Area Air Quality
Management District
939 Ellis Street
San Francisco, California 94109
Attention: Irwin Mussen

Bay Area Rapid Transit
District
800 Madison Street
Oakland, California 94607
Attention: Barbara Neustadter

Golden Gate Bridge Highway
& Transportation District
P.O. Box 9000, Presidio Station
San Francisco, California 94129
Attention: Dale W. Luehring

Metropolitan Transportation
Commission
Hotel Claremont
Berkeley, California 94705
Attention: Franceen Lyons

San Francisco Bay Transportation
Terminal Authority
P.O. Box 3366, Rincon Annex
San Francisco, California 94119
Attention: Herb Okubo

San Mateo County Transit District
400 South El Camino
San Mateo, California 94402

CITY AND COUNTY OF SAN FRANCISCO

City Planning Commission
100 Larkin Street
San Francisco, California 94102
Commissioners:
Toby Rosenblatt, President
Susan Bierman
Norman Karasick, Alternate
Eugene Kelleher, Alternate
Jerome Klein
Yoshio Nakashima
C. Mackey Salazar
Lee Woods, Commission Secretary

Landmarks Preservation Advisory Board
100 Larkin Street
San Francisco, California 94102
Board Members:
Patrick McGrew, President
Jean E. Kortum, Vice-President
Phillip P. Choy
Elizabeth de Losada
David M. Hartley
Carolyn Klemeyer
John Ritchie
Ann Sabiniano
Walter Sontheimer
Jonathan H. Malone, Secretary

Bureau of Building Inspection
450 McAllister Street
San Francisco, California 94102
Attention: Robert Levy,
Superintendent

Department of Public Works
City Hall, Room 260
San Francisco, California 94102
Attention: Jeffrey Lee

Department of Public Works
Traffic Engineering Division
460 McAllister Street
San Francisco, California 94102
Attention: Scott Shoaf

Department of Public Works
Mechanical Section
45 Hyde Street, Room 222
San Francisco, California 94102
Attention: Ray G. Danehy

San Francisco Fire Department
260 Golden Gate Avenue
San Francisco, California 94102
Attn: Edward E. Murphy, Chief
Division of Support Services

MUNI Planning Division
949 Presidio Avenue, Room 204
San Francisco, California 94115
Attention: Peter Straus

San Francisco Committee for
Utility Liaison (CULCOP)
City Hall, Room 363
San Francisco, California 94102
Attention: Herman Beneke

Mayor's Economic Development Council
480 McAllister Street
San Francisco, California 94102
Attention: Richard Goblirsch

Public Utilities Commission
City Hall, Room 287
San Francisco, California 94102
Attention: Richard Sklar

Public Utilities Commission
Energy Conservation
949 Presidio Avenue
San Francisco, California 94115
Attention: Flint Nelson

San Francisco Real Estate Department
450 McAllister Street, Room 600
San Francisco, California 94102
Attention: Wallace Wortman,
Director of Property

San Francisco Water Department
Distribution Division
425 Mason Street
San Francisco, California 94102
Attn: George Nakasaki, Manager

GROUPS & INDIVIDUALS

American Institute of Architects
Northern California Chapter
790 Market Street
San Francisco, California 94102

Bay Area Council
348 World Trade Center
San Francisco, California 94111

Building Owners and Managers
Association
690 Market Street
San Francisco, California 94104
Attention: Elmer Johnson

Building Service Employees Union
Local 87
240 Golden Gate Avenue
San Francisco, California 94102

Charles Hall Page and Associates
364 Bush Street
San Francisco, California 94104

Downtown Senior Social Services
295 Eddy Street
San Francisco, California 94102

Downtown Association
582 Market Street
San Francisco, California 94104
Attn: Lloyd Pflueger, Manager

Economic Opportunity Center
District Council V
1173 Mission Street
San Francisco, California 94103
Attn: Lee Meyerzove, Chairman

Environmental Impact Planning Corp.
319 Eleventh Street
San Francisco, California 94103

The Foundation for San Francisco's
Architectural Heritage
2007 Franklin Street
San Francisco, California 94109
Attention: Grant Dehart
Executive Director

Friends of the Earth
1045 Sansome Street
San Francisco, California 94111
Attention: Connie Parrish

Gray Panthers
944 Market Street
San Francisco, California 94102
Attention: W. Nunnally

Gruen Gruen & Associates
564 Howard Street
San Francisco, CA 94105
Attention: Carrie George

Sue Hestor
4536 - 20th Street
San Francisco, California 94114

Junior Chamber of Commerce
251 Kearny Street
San Francisco, California 94108

League of Women Voters
12 Geary Street, Room 605
San Francisco, California 94108

Legal Assistance to the Elderly
944 Market Street, #803
San Francisco, California 94102

Market Street Development Project, Inc.
870 Market Street
San Francisco, California 94102
Attention: Bernard Averbach

North of Market Planning Coalition
295 Eddy Street
San Francisco, California 94103
Attention: R. Livingston, President

Mr. Gerald Owyang
1517 Reed Avenue, #2
San Diego, California 94118

Mrs. G. Bland Platt
339 Walnut Street
San Francisco, California 94118

San Francisco Beautiful
41 Sutter Street
San Francisco, California 94104
Attn: Mrs. H. Klussman, President

San Francisco Building and
Construction Trades Council
400 Alabama Street, Room 100
San Francisco, California 94110
Attention: Stanley Smith

San Francisco Chamber of
Commerce
465 California Street
San Francisco, California 94104
Attention: Richard Morten

San Francisco Convention and
Visitors Bureau
1390 Market Street, Suite 260
San Francisco, California 94102
Attention: R. Sullivan,
Manager

San Francisco Downtown Market Street
Improvement Association
17 Drumm Street
San Francisco, California 94111
Attention: Ralph Leon Isaacs

San Francisco Ecology Center
13 Columbus Avenue
San Francisco, California 94111

San Francisco Forward
690 Market Street
San Francisco, California 94104
Attention: Frank Noto

San Francisco Labor Council
3068 - 16th Street
San Francisco, California 94103
Attention: Bernard Speckman

San Francisco Planning and Urban
Research Association
312 Sutter Street
San Francisco, California 94108

San Franciscans for Reasonable
Growth
88 First Street, Rm. 600
San Francisco, California 94105

San Francisco Retail Merchants
Association
582 Market Street, Suite 1001
San Francisco, California 94104

San Francisco Tomorrow
88 First Street, Rm. 600
San Francisco, California 94105

Senior Escort Program
South of Market Branch
814 Mission Street
San Francisco, California 94103
Attention: Leslie Halford
Neighborhood Coordinator

Sierra Club
530 Bush Street
San Francisco, California 94105
Attention: Becky Evans

Tenants and Owners Development
Corp.
177 Jessie Street
San Francisco, California 94105
Attention: John Elberling

NEIGHBORING PROPERTY OWNERS

California Jones Company
425 California Street
San Francisco, California 94104

Lurie Company, Inc.
555 California #51000
San Francisco, California 94104

Thea W. Lambertsen
20 Raycliff Terrace
San Francisco, California 94115

Edward Keil, Patricia Keil,
Russel Keil, Bernidet Keil
244 Kearny Street
San Francisco, California 94108

Chester R. & Arde Konrad
c/o Executive Assistance, Inc.
415 Merchant Street
San Francisco, California 94111

Wafeth Corporation
c/o Lowenberg Realty Company
44 Montgomery Street, #4064
San Francisco, California 94104

Edward J. Connor &
Herbert P. McLaughlin
145 Montgomery Street, 2nd Fl.
San Francisco, California 94104

Campeau Corp. California
681 Market Street
San Francisco, California 94105

First NBS Corporation
234 Kearny Street
San Francisco, California 94108

Clifton R. & Frances I. Skinner
536 Funston Avenue
San Francisco, California 94118

Pan Pacific Ocean, Inc.
P.O. Box 2496
San Francisco, California 94126

Goldsmith, et al.
1800 Pacific Avenue
San Francisco, California 94109

Kee Cheong Leung, Inc.
c/o Edward Poon
41 Lake Forest Court
San Francisco, California 94131

Yankin, Inc.
c/o Angela Hall
747 Leavenworth Street, #4
San Francisco, California 94109

University Hill Foundation
c/o UCB Corp. Facilities 16-1
P.O. Box 3666
Terminal Annex
Los Angeles, California 90051

Dubbs Building, Inc.
c/o Sherman Clay & Company
851 Traeser Avenue
San Bruno, California 94066

Crocker-Citizens Properties Corp.
c/o Crocker Properties, Inc.
111 Sutter Street
San Francisco, California 94104

Fritz Properties
1075 California Street
San Francisco, California 94108

Crocker Properties, Inc.
111 Sutter Street, #13
San Francisco, California 94104

MEDIA

San Francisco Bay Guardian
2700 19th Street
San Francisco, California 94110
Attn: Patrick Douglas, City Editor

San Francisco Chronicle
925 Mission Street
San Francisco, California 94103
Attention: Marshall Kilduff

San Francisco Examiner
110 5th Street
San Francisco, California 94103
Attention: Gerald Adams

San Francisco Progress
851 Howard Street
San Francisco, California 94103

The Sun Reporter
1366 Turk Street
San Francisco, California 94115

LIBRARIES

Documents Department (2 c.)
City Library - Civic Center
San Francisco, California 94102
Attention: Faith Van Liere

EPA
215 Fremont Street
San Francisco, California 94105
Attention: Jean Circiello

Government Documents Section
Stanford University Library
Stanford, California 94305

Government Publications Dept.
San Francisco State University
1630 Holloway Avenue
San Francisco, California 94132

Hastings College of the Law - Library
198 McAllister Street
San Francisco, California 94102

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1209 Moses Hall
University of California
Berkeley, California 94720

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550 Mission Street
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Gleeson Library
Golden Gate and Parker Avenue
San Francisco, California 94115

